

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

11/22/05

2003 JAN 22 P 3:20

SHENIA DANCY-STEWART as Administratrix )  
of the Estate of EVELINE BARROS-CEPEDA, ) Civil Action  
Plaintiff ) No.0511803MLW  
v. )  
THOMAS TAYLOR, Jr., and the )  
CITY OF BOSTON )  
Defendants )  
\_\_\_\_\_  
)

**PLAINTIFF'S MOTION FOR LEAVE TO  
VIDEOTAPE DEFENDANT'S DEPOSITION**

Plaintiff moves for leave of Court to videotape the deposition of defendant Thomas Taylor, the presently scheduled date for which is January 30<sup>th</sup> at 2:00 P.M. and January 31<sup>st</sup> from 10:00 A.M. until it is completed that same day.

Thomas Taylor is the sole individual defendant in this case and is being sued for shooting an innocent passenger in the back of a motor vehicle to death. The plaintiff states that the availability of visual information cannot help but enhance the jury's ability to assess demeanor and credibility of this crucial witness at the time he is being asked the questions for the first time and in the absence of any opportunity to go over, rehearse or otherwise practice for his appearance in Court.

Given the compressed timetable for discovery and the imminence of this deposition, a prompt ruling by the Court is requested.

Respectfully submitted

  
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